

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

TRATHONY GRIFFIN, MICHAEL GODWIN,
and FRANK CALLACE,

Plaintiffs,

-against-

SIRVA, INC.; ALLIED VAN LINES, INC.; and
ASTRO MOVING AND STORAGE CO., INC.,

Defendants.

DEFENDANT'S PROPOSED
VOIR DIRE QUESTIONS

11-cv-1844 (MKB)(SIL)

Defendant Astro Moving and Storage Co., Inc. proposes the following voir dire questions:

1. Have you ever been a juror before? If so, how many times?
2. Have you or any members of your family or close friends been a party to a lawsuit as a plaintiff or a defendant? Please explain briefly the nature of the lawsuit.
3. Have you or any members of your family or close friends been a victim of discrimination in the workplace or in any other way?
4. Do you think that if a person brings a law suit they must have some basis for that law suit?
5. Are you a member of a trade union?
6. Have you ever terminated a person's employment? If so, did the person that was terminated appeal the decision to any governmental agency or court?
7. Have you ever been terminated by your employer? Did you think it was fair? Did you appeal your termination to any governmental agency or court?
8. Has anyone you worked with sued your employer? Was the co-worker justified in bringing that lawsuit?
9. Have you ever filled out an employment application that authorized a background check on you? Should an employer inquire into an employee's criminal history?
10. Do you have any relatives or close friends who have been convicted of criminal offenses and served time in prison?
 - a. If so, did they have a difficult time finding jobs after being released from prison?

11. Have you ever heard of the New York State Sex Offense Registry? Have you ever searched on the New York State Sex Offender Registry?
12. Should a person who is convicted of committing a "sex offense" be treated differently from criminals convicted of other types of crimes?
13. Is a person who is convicted of committing a sex offense more or less likely to be rehabilitated so that he or she will not commit a sex offense again?

Dated: Garden City, New York
October 20, 2014

ALBANESE & ALBANESE LLP

By:



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